

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JANE DOE, for herself and the class,

Plaintiff,

v.

Case No.: 1:25-cv-10343-PBS

THE CHILDREN'S HOSPITAL
CORPORATION,

Defendant.

JOINT STATUS REPORT

Pursuant to the Court's September 18, 2025 Order (Doc. 42), Plaintiff Jane Doe ("Plaintiff"), and Defendant The Children's Hospital Corporation ("Defendant") (jointly, the "Parties"), through their undersigned counsel, jointly submit this status report.

The Parties participated in a mediation on September 30, 2025. While the Parties were unable to settle the case at mediation, they are currently engaged in post-mediation discussions regarding a potential resolution of this matter. Accordingly, the Parties request a 30-day continuance of the litigation to finalize their discussions.

Should these ongoing discussions not result in settlement, the parties will file a joint status report on or before November 17, 2025, or on or before such other date as set by the Court.

Plaintiff's Position Regarding Additional Matters: Advising the Court further, Plaintiff will file this week a motion to amend her complaint to address the evolving standards and court guidance for pleading a claim under the Electronic Communications Privacy Act ("ECPA") involving the use of tracking technologies on hospital websites and to respond to arguments Defendant made in its reply on its motion to dismiss regarding whether Plaintiff is the real-party-

10/17/25
the court allows
a 30 day continuance
of this matter. Dan S